

CHRISTOPHER CHIOU  
Acting United States Attorney  
District of Nevada  
Nevada Bar Number 14853  
JACOB H. OPERSKALSKI  
Assistant United States Attorney  
Nevada Bar Number 14746  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
PHONE: (702) 388-6336  
[jacob.operskalski@usdoj.gov](mailto:jacob.operskalski@usdoj.gov)  
*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EDUARDO LOPEZ,

Defendant.

Case No.: 2:20-cr-00119-RFB-DJA

**Stipulation for a Protective Order  
(First Request)**

The parties, by and through the undersigned, respectfully request that the Court issue an Order protecting from disclosure to the defendant, EDUARDO LOPEZ, the public, or any third party not directly related to this case, any and all unredacted body-worn camera footage discovery (the "Protected Material") in this case. The parties state as follows:

1. On June 10, 2020, a grand jury returned an indictment charging LOPEZ with one count of being a Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). ECF No. 4.

2. The trial was recently continued and is currently set for February 21, 2022.

3. The government has already produced initial redacted discovery---Bates-stamped items to defense counsel.

1           4.       The defendant, EDUARDO LOPEZ, has access to review and obtain copies of  
2 all redacted discovery produced by the government to defense counsel.

3           5.       The government has body-worn camera footage from Las Vegas Metropolitan  
4 Police Officers who assisted with the apprehension of the defendant in this case. Some of the  
5 unredacted video footage includes images of and personal identifying information of a potential  
6 victim(s), witnesses, and unrelated persons to this investigation. The government believes that  
7 dissemination of the unredacted discovery (“the Protected Material”) in its entirety could reveal  
8 personal identifying information of a potential victim(s), witnesses, and persons unrelated to  
9 this investigation.

10          6.       In order to protect the potential victim(s), witnesses, and unrelated persons  
11 involved in and revealed by the Protected Material, the parties intend to restrict access to the  
12 Protected Material in this case to the following individuals: attorneys for all parties, and any  
13 personnel that the attorneys for all parties consider necessary to assist in performing the  
14 attorneys’ duties in the prosecution or defense of this case, including investigators, paralegals,  
15 experts, support staff, interpreters, and any other individuals specifically authorized by the  
16 Court (collectively, the “Covered Individuals”). The defendant, EDUARDO LOPEZ, shall not  
17 review or obtain a copy of the Protected Material.

18          7.       Without leave of Court, the Covered Individuals shall not:

19               a.       make copies for, or allow copies of any kind to be made by any other  
20 person of the Protected Material in this case or permit dissemination of the Protected Material  
21 at the Southern Nevada Detention Center jail facility, or any other detention facility where the  
22 Defendant is housed, to include leaving a copy of the Protected Material at any detention  
23 facility where the Defendant is housed;  
24

1                   b.     allow any other person to watch, listen, or otherwise review the Protected  
2 Material;

3                   c.     use the Protected Material for any other purpose other than preparing to  
4 defend against or prosecute the charge in the indictment or any further superseding indictment  
5 arising out of this case; or

6                   d.     attach the Protected Material to any of the pleadings, briefs, or other court  
7 filings except to the extent those pleadings, briefs, or filings are filed under seal.

8           8.     Nothing in this stipulation is intended to restrict the parties' use or introduction of  
9 the Protected Material as evidence at trial or support in motion practice. If the defendant  
10 proceeds to trial or any evidentiary hearing, the parties will confer to determine whether it will  
11 be necessary for the government to disclose redacted versions of certain videos that would not be  
12 subject to the terms of this protective order.

13           9.     The parties shall inform any person to whom disclosure may be made pursuant  
14 to this order of the existence and terms of this Court's order.

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10. The defense hereby stipulates to this protective order.

DATED this October 8, 2021.

Respectfully submitted,

CHRISTOPHER CHIOU  
Acting United States Attorney

/s/ Jacob H. Operskalski  
JACOB H. OPERSKALSKI  
Assistant United States Attorney  
Attorneys for Plaintiff  
UNITED STATES OF AMERICA

RENE L. VALLADARES  
Federal Public Defender

/s/ LaRonda Martin  
LaRONDA R. MARTIN  
JAWARA GRIFFIN  
Assistant Federal Public Defenders and  
Attorneys for Defendant EDUARDO  
LOPEZ

**IT IS SO ORDERED:**



HONORABLE RICHARD F. BOULWARE, II  
United States District Judge

DATE: November 9, 2021, *nunc pro tunc*  
dated October 9, 2021.